

Deborah A. Sivas (CA Bar No. 135446)
Holly D. Gordon (CA Bar No. 226888)
STANFORD LAW SCHOOL ENVIRONMENTAL
LAW CLINIC
Crown Quadrangle
559 Nathan Abbott Way
Stanford, California 94305-8610
Telephone: (650) 725-8571
Facsimile: (650) 723-4426

Attorneys for Plaintiffs ENVIRONMENTAL PROTECTION
INFORMATION CENTER and AMERICAN LANDS ALLIANCE

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

ENVIRONMENTAL PROTECTION)
INFORMATION CENTER and)
AMERICAN LANDS ALLIANCE,)
Plaintiffs,)
v.)
UNITED STATES FOREST SERVICE,)
Defendant.)

Case No. C 02-2708 JCS

**SECOND STIPULATION AND
[PROPOSED] ORDER TO
EXTEND TIME TO FILE
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES AND
COSTS**

1 Plaintiffs intend to file a motion seeking attorneys' fees and costs for the component of the
 2 case that arose after the merits phase of the case. Defendant expects that it would oppose such
 3 motion. The parties are currently engaged in settlement discussions regarding Plaintiffs' attorneys
 4 fees and costs. In the interests of trying to resolve Plaintiffs' claim without the need for further
 5 litigation, counsel for Plaintiffs and Defendant request that this court extend the time for the filing
 6 of Plaintiffs' motion up to and including December 15, 2006.

7
 8 Respectfully Submitted,

9
 10 /s/
 Holly D. Gordon
 Deborah A. Sivas
 STANFORD LAW SCHOOL
 ENVIRONMENTAL LAW CLINIC
 Crown Quadrangle
 559 Nathan Abbott Way
 Stanford, California 94305-8610
 Telephone: (650) 725-8571
 Facsimile: (650) 723-4426

11
 12
 13
 14
 15 Attorneys for Plaintiffs

16 Sue Ellen Wooldridge
 Assistant Attorney General
 Environment and Natural Resources
 Division

17
 18 /s/
 19 Cynthia S. Huber
 Senior Attorney
 Natural Resources Section
 Environment and Natural Resources
 Division
 U.S. Department of Justice
 P.O. Box 663
 Washington, D.C. 20044
 (202) 514-5273

20
 21
 22
 23
 24 Kevin V. Ryan (SBN 118321)
 United States Attorney
 Northern District of California

25
 26 Charles M. O'Connor (SBN 56320)
 Assistant United States Attorney
 Northern District of California
 450 Golden Gate Avenue
 P.O. Box 36055
 27
 28

San Francisco, CA 94102
(415) 436-7180

Attorneys For Defendant

[PROPOSED] ORDER

IT IS HEREBY ORDERED that the foregoing proposed extension of time for Plaintiffs to file a motion for attorneys' fees and costs until December 15, 2006 is granted.

Dated: October 23, 2006

